

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

*Filed In
Open
Court
2/24/04
B.B.*

UNITED STATES OF AMERICA)

v.)

CR. NO. 04-10044-MLW

EDWIN SERRANO,
A/K/A "KING PSYCHO"

UNITED STATES OF AMERICA)

v.)

CR. NO. 04-10047 RCL

LUIS RODRIGUEZ,
A/K/A "ONE EYED LUIS"

UNITED STATES OF AMERICA)

v.)

CR. NO. 04-10049 WGY

JUAN CONCE,
A/K/A "KING SANTOS"

GOVERNMENT'S MOTION TO CONSOLIDATE FOR
DETENTION PROCEEDINGS AND
SUBMISSION OF DETENTION AFFIDAVIT

The United States hereby moves to consolidate the above captioned matters for purposes of detention proceedings. In support of this motion, the government states as follows:


1. On February 19, 2004, a grand jury in this District returned ten separate but related indictments, which included the above-captioned cases. These cases all arose from a broader FBI investigation of the drug trafficking and other illegal

activities of the Almighty Latin King/Queen Nation ("the Latin Kings"), a violent street gang operating in, among other places Lawrence and Lowell, Massachusetts. Because evidence regarding the dangerousness of these defendants includes evidence regarding their involvement in the Latin Kings (and its leadership), consolidation of these cases for detention proceedings will enable these matters to be presented to the court in an efficient and orderly way and is therefore in the interest of justice.

In further support of this motion, the government refers this court to the detention affidavit of FBI Special Agent Mark Karangekis, which is attached hereto.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: 
JOHN A. WORTMANN, JR.
PETER K. LEVITT
Assistant U.S. Attorneys

February 24, 2004